



Driving progress
through partnership

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August 5, 2020

VIA ECF

Honorable Ronnie Abrams
United States District Judge
for the Southern District of New York
40 Foley Square
New York, New York

Re: *Deck R. v. Highmark Blue Cross Blue Shield et al.*, 19-cv-10490

Dear Judge Abrams:

We represent Defendant Highmark Blue Cross Blue Shield (“Defendant” or “Highmark”) and write jointly with Plaintiff Deck R. (“Plaintiff”) to respectfully request an extension of certain discovery deadlines discussed below, and an adjournment of the post-fact discovery conference currently scheduled for August 14, 2020 at 4:15 PM.

Pursuant to the Court’s Case Management Plan and Scheduling Order, as extended by the Court’s June 26, 2020 Order, this matter is subject to the following deadlines:

- August 7, 2020: Parties to submit joint status letter.
- August 10, 2020: Fact discovery deadline.
- August 14, 2020: Post-fact discovery conference.
- September 30, 2020: Expert discovery deadline.

The parties seek a two-month adjournment of the fact discovery and expert discovery deadlines to October 7, 2020 and November 30, 2020 respectively. The parties seek an adjournment of the joint status letter and post-fact discovery conference until after the November 30, 2020 expert discovery deadline.

The parties seek this extension because document collection and other discovery related activities have taken longer than expected because of the number of claims at issue, and COVID-related delays. Plaintiff previously sought a 45-day extension of the fact discovery deadline, which the Court granted on June 26, 2020.

We thank the Court for its attention to this matter.

Respectfully,

Honorable Ronnie Abrams
August 5, 2020
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Application granted. The post-fact discovery conference is hereby converted to a post-discovery conference and adjourned to December 4, 2020 at 2 PM. The parties shall submit their joint status letter no later than November 27, 2020.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', written over a horizontal line.

Hon. Ronnie Abrams
8/6/2020